

IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF NEW YORK

DH CAPITAL, LLC,

NO. 07 CV 5579 (RMB)

Plaintiff,

v.

**NOTICE OF MOTION FOR  
ADMISSION OF SARA B.  
RICHMAN *PRO HAC VICE***

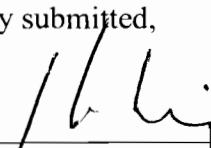
XANADOO, LLC,

Defendant.

PLEASE TAKE NOTICE that upon the accompanying Affidavit of Kenneth J. King, Esquire, executed on August 29, 2007, and the exhibits annexed thereto, Xanadoo, LLC ("Xanadoo") will move this Court, before the Honorable Richard M. Berman, United States District Judge, at the Daniel Patrick Moynihan United States Courthouse, 500 Pearl Street, New York, New York, on such date and at such time to be set by the Court, for an Order granting Sara B. Richman admission to this Court to argue and try the above-captioned action, in whole or in part, on behalf of Defendant Xanadoo, LLC, pursuant to Local Civil Rule 1.3(c) of the United States District Court for the Southern District of New York.

Dated: August 29, 2007

Respectfully submitted,

  
Kenneth J. King (KK 3567)  
PEPPER HAMILTON LLP  
Suite 2320  
420 Lexington Avenue  
New York, NY 10170-2399  
(212) 808-2700

Attorneys for Defendant

AUG 29 2007

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**IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF NEW YORK**

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|------------------|---|--|
| DH CAPITAL, LLC, | : |  |
|                  | : |  |
|                  | : | NO. 07 CV 5579 (RMB)   |
|                  | : |  |
| Plaintiff,       | : |  |
|                  | : |  |
| v.               | : | <b>MOTION FOR ADMISSION<br/>OF SARA B. RICHMAN <i>PRO<br/>HAC VICE</i></b> |
|                  | : |  |
| XANADOO, LLC,    | : |  |
|                  | : |  |
| Defendant.       | : |  |
|                  | : |  |
|                  | : |  |

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**MOTION FOR ADMISSION *PRO HAC VICE***

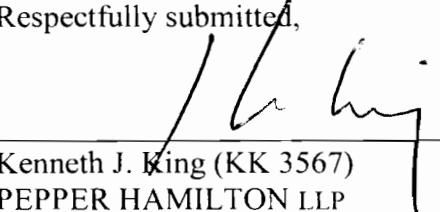
PURSUANT TO LOCAL RULE 1.3(c) of the Local Rules of the United States District Courts for the Southern and Eastern Districts of New York, I, Kenneth J. King, a member in good standing of the bar of this Court, hereby move for an Order allowing the admission *pro hac vice* of:

Sara B. Richman  
Pepper Hamilton LLP  
3000 Two Logan Square, 18<sup>th</sup> & Arch Streets  
Philadelphia, PA 19103  
215-981-4000  
[richmans@pepperlaw.com](mailto:richmans@pepperlaw.com)

Sara B. Richman is a member in good standing of the Bar of the Commonwealth of Pennsylvania. There are no pending disciplinary proceedings against Sara B. Richman in any State or Federal Court.

Dated: August 29, 2007

Respectfully submitted,

  
Kenneth J. King (KK 3567)  
PEPPER HAMILTON LLP  
Suite 2320  
420 Lexington Avenue  
New York, NY 10170-2399  
(212) 808-2700

Attorneys for Defendant

**IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF NEW YORK**

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|                  |   |                                |
|------------------|---|--------------------------------|
| DH CAPITAL, LLC, | : |                                |
|                  | : |                                |
|                  | : | NO. 07 CV 5579 (RMB)           |
|                  | : |                                |
| Plaintiff,       | : |                                |
|                  | : | <b>AFFIDAVIT IN SUPPORT OF</b> |
|                  | : | <b>MOTION FOR ADMISSION</b>    |
| v.               | : | <b>OF SARA B. RICHMAN</b>      |
|                  | : | <b><i>PRO HAC VICE</i></b>     |
|                  | : |                                |
| XANADOO, LLC,    | : |                                |
|                  | : |                                |
| Defendant.       | : |                                |
|                  | : |                                |

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Kenneth J. King, Esquire, being duly sworn, deposes and says:

1. I am a member of the bar of this Court and a partner at Pepper Hamilton LLP, counsel for Xanadoo, LLC ("Xanadoo") in this action. I submit this affidavit in support of Xanadoo's application for an order granting Sara B. Richman *pro hac vice* admission to this Court to argue and try the above-captioned action, in whole or in part, on behalf of Xanadoo, pursuant to Local Civil Rule 1.3(c) of the United States District Court for the Southern District of New York.

2. Sara B. Richman is an associate at Pepper Hamilton, LLP. She is admitted to practice before the courts of Pennsylvania. She is and has been a member in good standing of the bar of the Commonwealth of Pennsylvania. Her Certificate of Good Standing is annexed hereto as Exhibit A.

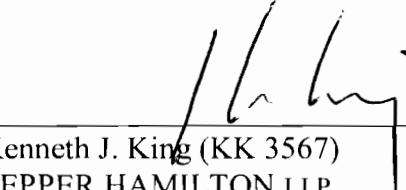
3. Pursuant to Local Civil Rule 1.3(c) of the United States District Court for the Southern District of New York, I request that Sara B. Richman be permitted to argue or try the above-captioned case.

4. Attached as Exhibit B is a proposed Order granting this motion.

5. There has been no prior application in this case for the *pro hac vice* admission of Sara B. Richman.

WHEREFORE, it is respectfully requested that this Court grant Sara B. Richman *pro hac vice* admission to the bar of this Court for the purpose of arguing and trying this case.

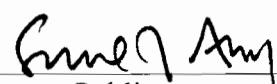
Respectfully submitted,



Kenneth J. King (KK 3567)  
PEPPER HAMILTON LLP  
Suite 2320  
420 Lexington Avenue  
New York, NY 10170-2399  
(212) 808-2700

Attorneys for Defendant

Sworn to before me this  
29<sup>th</sup> day of August, 2007.



Notary Public

SAMUEL J. ABATE, JR.  
Notary Public, State of New York  
No. 02A64754385  
Qualified in Westchester County  
Commission Expires June 30, 2011

IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF NEW YORK

DH CAPITAL, LLC,

NO. 07 CV 5579 (RMB)

Plaintiff,

**AFFIDAVIT OF SERVICE**

v.

XANADOO, LLC,

Defendant.

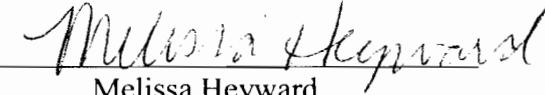
STATE OF NEW YORK )  
                          )ss.:  
COUNTY OF NEW YORK )

The undersigned, being duly sworn, deposes and says that she is over the age of 18 years, and is not a party to this action.

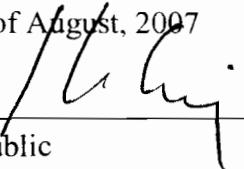
That, on the 29th of August, 2007, she caused to be served the within motion papers for the admission of Sara B. Richman Pro Hac Vice by first class mail upon:

Lance J. Gotko, Esquire  
Friedman Kaplan Seiler & Adelman LLP  
1633 Broadway  
New York, New York 10019-6708

the address having been designated by said attorneys for that purpose, by depositing a true copy of same, securely enclosed in a postpaid properly addressed wrapper, in an official depository under the exclusive care and custody of the United States Postal Service.

  
Melissa Heyward

Sworn to before me this  
29th day of August, 2007

  
Notary Public

NOTARY PUBLIC  
NO. 02-345678  
Qualified in New York  
Commission Expires: 08/2008



Supreme Court of Pennsylvania

**CERTIFICATE OF GOOD STANDING**

*Sara Beth Richman, Esq.*

**DATE OF ADMISSION**

*October 21, 2005*

The above named attorney was duly admitted to the bar of the Commonwealth of Pennsylvania, and is now a qualified member in good standing.



**Witness my hand and official seal**  
Dated: August 8, 2007

  
\_\_\_\_\_  
Patricia A. Johnson  
Chief Clerk

**IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF NEW YORK**

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|                  |   |                                    |
|------------------|---|------------------------------------|
| DH CAPITAL, LLC, | : |                                    |
|                  | : |                                    |
|                  | : | NO. 07 CV 5579 (RMB)               |
|                  | : |                                    |
| Plaintiff,       | : |                                    |
|                  | : | <b>ORDER GRANTING</b>              |
| v.               | : | <b>ADMISSION OF SARA B.</b>        |
|                  | : | <b>RICHMAN <i>PRO HAC VICE</i></b> |
|                  | : |                                    |
| XANADOO, LLC,    | : |                                    |
|                  | : |                                    |
| Defendant.       | : |                                    |
|                  | : |                                    |
|                  | : |                                    |

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**ORDER**

On this \_\_\_\_ day of \_\_\_\_\_, 2007, upon the motion of Xanadoo, LLC for an Order pursuant to Local Civil Rule 1.3(c) of the United States District Court for the Southern District of New York granting *pro hac vice* admission to Sara B. Richman in connection with the above-captioned case, and upon consideration of the motion and the affidavit in support thereof, it is ORDERED that

Sara B. Richman  
Pepper Hamilton LLP  
3000 Two Logan Square, 18<sup>th</sup> & Arch Streets  
Philadelphia, PA 19103  
215-981-4000  
[richmans@pepperlaw.com](mailto:richmans@pepperlaw.com)

is GRANTED *pro hac vice* admission to the bar of this Court for the purpose of participating in, arguing and trying this action. Counsel shall immediately apply for any ECF password at [nysd.uscourts.gov](http://nysd.uscourts.gov).

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Richard M. Berman  
United States District Judge